**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

UNITED STATES OF AMERICA	)	CRIMINAL NO. 3:21CR525
	)	
v.	)	
	)	**DEFENDANT JEFFREY ALAN**
JEFFREY ALAN BENJAMIN	)	**BENJAMIN'S MOTION TO**
	)	**TRANSFER VENUE**
Defendant.	)	
	)	
	)	
	)	

Defendant Jeffrey Alan Benjamin, through undersigned counsel, respectfully moves for

an intra-district transfer of venue to the Greenville Division, pursuant to Federal Rule of

Criminal Procedure 18 and the Sixth Amendment of the United States Constitution.

As detailed in the accompanying memorandum of law, transfer of venue is necessary and

appropriate to safeguard Mr. Benjamin's Constitutional right to a fair trial before an impartial

jury, because: (1) the indictment in this cases alleges that the ratepayers, bondholders, and

investors of SCANA and Santee Cooper were the ultimate victims of the alleged fraud, and

therefore, such individuals and their close friends and family must be excluded from the jury

pool; and (2) the pervasive, negative pretrial publicity about the V.C. Summer Project,

concentrated in the Columbia capital region and the area from which the Columbia Division

draws its jury pool, has created an intolerable risk of inherent bias against Mr. Benjamin in the

Columbia Division.

For all these reasons, the Court should transfer venue to the Greenville Division, where

Mr. Benjamin can receive a fair trial before an impartial jury that is not comprised of his alleged

victims, their friends, and family members.

Respectfully submitted,

Date: February 8, 2023

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